

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PA

IN RE:	KARL W. KROUSE	:	NO. 16-10694 TPA
	BETTY C. KROUSE	:	Chap. 13
	Debtor	:	
M&T Bank		:	Declaration of Attorney for Debtor
		:	Date for proposed change: 1/1/17
		:	
	Movant	:	
		:	Doc. No.
	vs.	:	
KARL W. KROUSE	BETTY C. KROUSE	:	Related to Claim 3
RONDA J. WINNECOUR ESQ, TRUSTEE:		:	
Respondents		:	

DECLARATION

I, Earle D. Lees, Jr., Esquire, attorney for the above named debtors, declare that I have reviewed the Amended Plan (dated 12/14/16), recomputed the post-petition Plan payment, and find that the Amended Plan payment is sufficient to fund the Plan with the new debt added.

The new post-petition monthly payment payable to M&T Bank is \$648.85 effective January 1, 2017 for the following reasons:

1. The escrow account payment has increased from \$377.55 to \$380.78 monthly..
2. The Amended Plan dated 12/14/16 has included the new total monthly payment of \$648.85.

Earle D. Lees, Jr., Esq. /s

Earle D. Lees, Jr., Esq.  
Attorney for Debtor  
P.O. Box 685  
DuBois, PA 15801  
(814) 375-9310  
Atty. ID# 15763